



KOSS & SCHONFELD, LLP

ATTORNEYS AT LAW

Writer's email: simcha@kandsllp.com
Writer's direct dial: (212) 796-8916

April 26, 2021

Via ECF

Hon. Gabriel W. Gorenstein
Magistrate Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMORANDUM ENDORSEMENT

Re: *GateGuard, Inc. v. Goldmont Realty Corp., et al.*
Case No.: 1:20-cv-01609-AJN-GWG

Dear Judge Gorenstein:

This office represents defendants Goldmont Realty Corp. ("Goldmont"), Leon Goldenberg and Abi Goldenberg in the above referenced action (collectively, the "Defendants"). Pursuant to the Court's Order dated April 16, 2021 (Docket No. 41), the parties have met and conferred to discuss outstanding discovery on April 19, 2021 and have continued to produce discovery documents on a rolling basis.

Pursuant to paragraph 1.E of this Court's Individual Practices, the parties respectfully request an extension of current discovery deadlines (see Docket No. 34) by three (3) months, as follows:

- Depositions shall be completed by July 26, 2021;
- Completion of fact discovery by July 26, 2021; and
- All expert discovery shall be completed by August 9, 2021.

Plaintiff previously requested extensions to various court appearances. Defendants request the above referenced relief to ensure that they have time to review all discovery produced thus far. Plaintiff does not object to the above requested relief.

We thank the Court for its attention to the above.

The proposed schedule is approved.

So Ordered.

GABRIEL W. GORENSTEIN
United States Magistrate Judge
April 27, 2021

Respectfully Submitted,

Simcha D. Schonfeld, Esq.

cc: Ariel Reinitz, Esq. (via email – ariel.Reinitz@fisherbroyles.com)